

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

MCDONALD’S CORPORATION,

Plaintiff,

v.

VANDERBILT ATLANTIC HOLDINGS
LLC,

Defendant.

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No. 1:19-cv-06471-DLI-ST

**DECLARATION OF DENISE
ALVAREZ IN FURTHER SUPPORT
OF PLAINTIFF’S MOTION *IN*
LIMINE TO PRECLUDE THE
ADMISSION OF CERTAIN
EMAILS INTO EVIDENCE**

DENISE ALVAREZ, an attorney admitted to practice law in the State of New York and in this Court, declares, pursuant to 28 U.S.C. §1746, as follows:

1. I am a partner at the law firm of Pashman Stein Walder Hayden, P.C., attorneys for Plaintiff McDonald’s Corporation (“McDonald’s”) in this matter.

2. I submit this declaration in further support of McDonald’s motion *in limine* to preclude the admission of certain emails identified by Vanderbilt Atlantic Holdings LLC (“Vanderbilt”) on its trial exhibit list submitted with the Amended Proposed Joint Civil Pretrial Order, dated January 3, 2025 [ECF No. 106]. I make this declaration based on personal knowledge unless otherwise stated herein.

3. Attached as **Exhibit 1** is a true and correct copy of the privilege log served by Vanderbilt in this matter.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: March 14, 2025

/s/ Denise Alvarez

Denise Alvarez